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10 **BEFORE THE**
BOARD OF REGISTERED NURSING
11 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

12 In the Matter of the Accusation Against:

Case No. 2013-922

13
14 **TERESA MAE WHITE**
a.k.a. TERESA MARTINOLICH
a.k.a. TERESA MARTINOLICH WHITE
15 **93159 Brownsmead Hill Road**
Astoria, OR 97103

A C C U S A T I O N

16
17 **Registered Nurse License No. 643318**

18 Respondent.

19 Complainant alleges:

20 **PARTIES**

21 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
22 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
23 Consumer Affairs.

24 2. On or about August 19, 2004, the Board of Registered Nursing issued Registered
25 Nurse License Number 643318 to Teresa Mae White, a.k.a. Teresa Martinolich, a.k.a. Teresa
26 Martinolich White (Respondent). The Registered Nurse License expired on March 31, 2012, and
27 has not been renewed.

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1 fees specified in Section 1417 and providing evidence that he or she holds a current valid active
2 and clear registered nurse license in another state, a United States territory, or Canada, or by
3 passing the Board's current examination for licensure."

4 COST RECOVERY

5 8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
6 administrative law judge to direct a licentiate found to have committed a violation or violations of
7 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
8 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being
9 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
10 included in a stipulated settlement.

11 CAUSE FOR DISCIPLINE

12 (Unprofessional Conduct - Out of State Discipline)
13 (Bus. & Prof. Section 2761, subd. (a)(4))

14 9. Respondent is subject to disciplinary action under section 2761(a)(4) of the Code in
15 that on or about July 18, 2012, in *The Matter of Teresa Martinolich, RN, License No.*
16 *097003211RN, Reference No. 12-01196*, the Oregon State of Nursing (Oregon Board) made
17 Findings of Fact, Conclusions of Law and issued an Order thereon to revoke Respondent's
18 nursing license for reasons substantially related to the practice of nursing. The circumstances are
19 as follows:

20 10. On or about November 29, 2011, the Oregon Board received information alleging that
21 Respondent tested positive on a drug screen for THC, Methamphetamine, Opiates, and
22 Amphetamines, prior to the delivery of her child and that the child showed withdrawal symptoms
23 during delivery. Respondent failed to respond to subsequent attempts by Oregon Board staff to
24 interview her and, on March 21, 2012, her license was suspended until she fully complied and
25 cooperated with the Oregon Board's investigation.

26 11. On or about June 27, 2012, the Oregon Board served Respondent with a Notice of
27 Proposed Revocation of Registered Nurse License and granted her an opportunity for hearing if
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1 requested within 20 days of the mailing of the Notice. Respondent defaulted on the Notice by
2 failing to respond within the allotted time period and, as a result, Respondent's license to practice
3 nursing in Oregon was revoked on or about July 18, 2012.

4 PRAYER

5 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
6 and that following the hearing, the Board of Registered Nursing issue a decision:

7 1. Revoking or suspending Registered Nurse License Number 643318, issued to Teresa
8 Mae White, a.k.a. Teresa Martinolich, a.k.a. Teresa Martinolich White;

9 2. Ordering Teresa Mae White, a.k.a. Teresa Martinolich, a.k.a. Teresa Martinolich
10 White, to pay the Board of Registered Nursing the reasonable costs of the investigation and
11 enforcement of this case, pursuant to Business and Professions Code section 125.3;

12 3. Taking such other and further action as deemed necessary and proper.
13

14 DATED: APRIL 18, 2013

15 *for* Stacey Ben
16 LOUISE R. BAILEY, M.ED., RN
17 Executive Officer
18 Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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